

STATE OF NEW YORK     )  
  ) ss.:  
COUNTY OF)

**ALAN KADISH, M.D.**, being duly sworn, deposes and says:

1. I am the President of Touro University (“Touro”).
2. Touro is a 501(c)(3) not for profit education corporation chartered by the New York State Board of Regents.
3. Touro College of Dental Medicine at New York Medical College (“TCDM”) is a division of Touro and is accredited by the Commission on Dental Accreditation (“CODA”).
4. As President, one of my many responsibilities is to oversee Touro’s academic programs and their administrators, including but not limited to Deans and Vice Deans.
5. TCDM opened on or about July 2016.
6. From inception, Dr. Edward Farkas (“Farkas”) has been an integral part of the Senior Administration of TCDM, and has held numerous titles during his Touro employment.
7. Most recently, on or about July 1, 2020, Touro entered into an employment agreement with Farkas, wherein Farkas was named the Vice Dean of TCDM.
8. On December 4, 2023, in a short conversation between Farkas and me, Farkas shared his intention to resign from employment at Touro.
9. Given Farkas’ integral and important role at TCDM, I asked Farkas to delay his resignation and to meet with me two days later, on December 6, 2023.
10. Indeed, I subsequently met with Farkas on December 6, 2023 at 6:00 PM.
11. After pleasantries, Farkas informed me that he had already executed an employment agreement with Yeshiva University, pursuant to which Farkas would be the founding dean of their dental school.

12. Prior to this conversation, Farkas had not disclosed a job offer from Yeshiva University nor otherwise informed Touro that he had, prior to separating from Touro employment, signed an employment agreement with Yeshiva University.

13. Upon learning that Farkas had already signed an employment agreement with Yeshiva University, I concluded that there was nothing further to discuss with Farkas regarding his Touro employment and agreed, therefore, to accept his resignation effective January 1, 2024.

14. Following my December 6, 2023 meeting with Farkas, I learned that Farkas had obtained a substantial amount of Touro's Protected Information, which I believe he intended to disclose to Yeshiva University and/or to use for the benefit of Yeshiva University in his new role as its dental school dean.

15. When Farkas refused to take immediate corrective measures, including erasing all of Touro's Protected Information, I terminated him for cause, effective December 28, 2023.

**I affirm under penalty of perjury under the laws of the State of New York that the foregoing paragraphs are true and correct.**

A handwritten signature in black ink, appearing to read "Alan Kadish", is positioned above a horizontal line.

Alan Kadish, M.D.